201-15426

Anh Nguyen
06/30/2004 12:14 PM

To: NCIC HPV@EPA
cc:
Subject: Fw: Environmental Defense appreciates comments on 2-Methyl-1,3-propanediol (CAS# 2163-42-0)

----- Forwarded by Anh Nguyen/DC/USEPA/US on 06/30/2004 12:14 PM -----

rdenison@environmentaldefense.org
06/30/2004 12:05 PM

To: NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, claude.white@equistarchem.com
cc: MTC@mchsi.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org
Subject: Environmental Defense appreciates comments on 2-Methyl-1,3-propanediol (CAS# 2163-42-0)

(Submitted via Internet 6/30/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and claude.white@equistarchem.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 2-Methyl-1,3-propanediol (CAS# 2163-42-0).

Lyondell Chemical Company, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing data for 2-methyl-1,3-propanediol to address the required SIDS elements, and has proposed no further testing. This chemical is produced in very high volumes and is used extensively as a synthetic intermediate, solvent and in personal care products. As a result of its extensive use, particularly its use in cosmetics, 2-methyl-1,3-propanediol has been the subject of considerable study to characterize its environmental fate and toxicity.

The test plan does an excellent job of describing data to address each of the SIDS elements required by the HPV Challenge, and the studies are further described in the extensive and well-organized robust summaries. The only additional information we would recommend being included in the test plan would be some description of methods of transport and measures used or recommended to limit release or exposures if the chemical should be spilled or otherwise released in large volumes.

On review of this submission we note that numerous recent studies of 2-methyl-1,3-propanediol were sponsored by Lyondell Chemical Company. These studies appear carefully designed and conducted, in order to characterize fate and toxicity of 2-methyl-1,3-propanediol in some detail. Results of these studies indicate this chemical has a short half-life in the environment and has little acute toxicity to aquatic organisms or mammals. They also suggest that the chemical is not mutagenic and has little or no reproductive or developmental toxicity. It is unfortunate that results of these studies have not been published in the open literature. We would encourage Lyondell Chemical Company to publish a monograph describing the chemical properties, fate and toxicity of 2-methyl-1,3-propanediol, as an additional means of making this extensive work available to the public.

In summary, we consider this to be a very well-prepared submission that amply addresses each of the required SIDS elements.

Note:
Minor typos:
Table 1: The common name of 2-methyl-1,3-propanediol is given as "1" -methyl-1,3-propanediol.
Table 1: The structural formula is missing an H on carbon #2.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense